

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION

IN THE MATTER OF:)	CASE NO. 19-80959
)	
JAMES WILLARD BARNETT, JR.)	
VERLINDA VINSTON BARNETT)	CHAPTER 13
)	
SSN: XXX-XX-0731)	
SSN: XXX-XX-1827)	
)	
DEBTORS.)	
)	
RICHARD M. HUTSON II)	ADVERSARY PROCEEDING
)	CASE NO. 20-09011
)	
PLAINTIFF,)	
)	
V.)	
)	
CARVANA, LLC)	
)	
DEFENDANT.)	

MOTION TO EXTEND TIME TO FILE RESPONSIVE PLEADINGS

NOW COMES, Defendant, Carvana, LLC, ("Carvana") by and through its attorney of record, Joseph J. Vonnegut, and pursuant to Federal Rules of Civil Procedure 6(b) and 15, moves the Court to extend the time up to and including **September 22, 2020**, within which Carvana has to respond to Plaintiff's Complaint. In support of its motion, Carvana shows the Court that:

1. The time for Carvana to respond has not expired;
2. Counsel for Carvana and the Plaintiff are continuing to try and resolve their differences in this matter and the additional time will aid the Parties in resolving this case without added expense and time constraints; and
3. The attorney for Carvana has received the consent of Plaintiff's attorney as to the requested extension.

WHEREFORE, Defendant, Carvana, LLC requests, with the consent of Plaintiff's counsel, it be granted an extension of time up to and including **September 22, 2020** within

which to file a responsive pleading to Plaintiff's Complaint.

This, the 21st day of August 2020.

HUTCHENS LAW FIRM LLP

BY: /s/ Joseph J. Vonnegut
JOSEPH J. VONNEGUT
Attorneys for Carvana, LLC
Post Office Box 2505
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(910) 864-6888
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NC State Bar No. 32974

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date this *MOTION TO EXTEND TIME TO FILE RESPONSIVE PLEADINGS* as served upon the following parties by depositing a copy enclosed in a postpaid, properly addressed wrapper in a post office or official depository under the exclusive care and custody of the United States Postal Service or via the appropriate electronic servicer:

Plaintiff:

Richard M. Hutson II
Chapter 13 Office
3518 Westgate Drive
Suite 400
Durham, NC 27707

Plaintiff's Attorney:

Benjamin E. Lovell
Richard M. Hutson II, Standing Trustee
P. O. Box 3613
Durham, NC 27702

Bankruptcy Administrator:

William P. Miller
Bankruptcy Administrator
101 South Edgeworth Street
Greensboro, NC 27401

This, the 21st day of August 2020.

HUTCHENS LAW FIRM LLP

BY: /s/ Joseph J. Vonnegut
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